

Message

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**From:** Armann, Steve [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0E0EA7A009D4D75BC7BEA58747CCF9E-SARMANN]  
**Sent:** 6/27/2016 4:30:46 PM  
**To:** Huetteman, Tom [Huetteman.Tom@epa.gov]  
**Subject:** FW: Ag Park Air Monitoring  
**Attachments:** 20160615160715198.pdf; 2006 air monitoring plan.pdf

FYI

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**From:** Plate, Mathew  
**Sent:** Monday, June 27, 2016 9:02 AM  
**To:** Wilson, Patrick <[Wilson.Patrick@epa.gov](mailto:Wilson.Patrick@epa.gov)>  
**Cc:** LEONIDO-JOHN, STEVEN <[Leonido-John.Steven@epa.gov](mailto:Leonido-John.Steven@epa.gov)>; ZIFF, SARA <[ZIFF.SARA@EPA.GOV](mailto:ZIFF.SARA@EPA.GOV)>; Baylor, Katherine <[Baylor.Katherine@epa.gov](mailto:Baylor.Katherine@epa.gov)>; Armann, Steve <[Armann.Steve@epa.gov](mailto:Armann.Steve@epa.gov)>; Vianu, Libby (ATSDR/DCHI/WB) <[lj18@cdc.gov](mailto:lj18@cdc.gov)>; McNaughton, Eugenia <[McNaughton.Eugenia@epa.gov](mailto:McNaughton.Eugenia@epa.gov)>; Williamson, Derrick <[Williamson.Derrick@epa.gov](mailto:Williamson.Derrick@epa.gov)>  
**Subject:** FW: Ag Park Air Monitoring

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**From:** Penny Newman [<mailto:penny.n@CCAEEJ.org>]  
**Sent:** Wednesday, June 15, 2016 4:39 PM  
**To:** Plate, Mathew <[Plate.Mathew@epa.gov](mailto:Plate.Mathew@epa.gov)>  
**Subject:** Ag Park Air Monitoring

Hi Matt, I sent you the comments from AQMD regarding the Ag Park air monitoring. Attached is the 2006 Air Monitoring Plan that they refer to. I appreciate any help you can give us. The DTSC plan appears to be less than they did in 2006 which resulted in residents being buried in a dust storm from the site. On more than 52 days the dust levels were above the 7 mg set reaching more than 200. This plan calculates a new number that hits close to 50. The plan doesn't seem to even meet the basic guidelines of EPA's Air/Superfund National Technical Guidance Study Vol IV – Guidance for Ambient Air Monitoring at Superfund Sites (Revised). The developer has told us that he is willing to do whatever the agencies outline for him to do – if is more rigorous fine. Since the residents have been subjected to heavy dust before that has contaminated their homes (much like Exide) we feel they should go the extra mile to try to rebuild their credibility and show that they really care about the residents' health. Any assistance you can provide would be helpful. Thanks, Penny

Patrick,

I got a request from Penny Newman to look into the Air Monitoring that was being proposed for Riverside Ag Park (see emails below). I sent a message to SCAQMD to see what their level of involvement is and I talked with Steve Armann

today about your office's involvement. He suggested that you might be the best person to follow up with on off-site impacts, but I am coping others involved in case they have thoughts.

My initial thoughts on the air monitoring are:

- Dust control measures during remediation and construction are much more important than collecting monitoring data. However continuous monitoring of on-site PM and meteorology can aid in knowing when dust control needs to be improved or activities temporarily halted.
- The air sampling plan seems to imply that the exposure concern is ambient air. However, with PCBs we should also be concerned with the potential for deposition and long-term exposure. I am not sure that this would indicate that PCB data is required, but I suspect it might.
- Have we thought about testing indoor dust in the adjacent homes for PCBs? (It seems like PCB dust may have been blowing off the site for many years and could be in the downwind homes.)

I let Penny know that I was looking into the air monitoring plan and would get back to her. Do you have any thoughts on how we should respond? I will also try to get more information from SCAQMD, but I don't know that it will be too useful, as they don't have too much experience with PCBs. Please feel free to call me if you want to discuss this in more detail (23799).

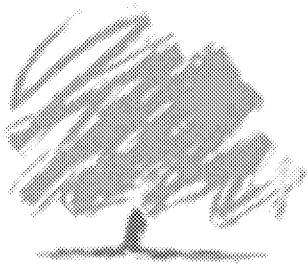
Thanks  
matt

**From:** Penny Newman [<mailto:penny.n@CCAEEJ.org>]  
**Sent:** Tuesday, June 14, 2016 10:37 AM  
**To:** Plate, Mathew <[Plate.Mathew@epa.gov](mailto:Plate.Mathew@epa.gov)>  
**Subject:** FW: Ag Park Air Monitoring

Oops! Here's the attachment! Penny

**From:** Penny Newman  
**Sent:** Tuesday, June 14, 2016 10:28 AM  
**To:** 'plate.mathew@epa.gov' <[plate.mathew@epa.gov](mailto:plate.mathew@epa.gov)>  
**Subject:** Ag Park Air Monitoring

Good morning, Matt, It was nice meeting you last week in the discussion on Wildomar. In the discussion about the Ag Park in Riverside we are continuing to have concerns about the work DTSC is doing. After finally getting them to do the confirmation testing and EPA finding elevated levels of PCBs they are set to begin excavation. We have not seen the results of their sampling prior to excavation (I understand they took more than 1,000 samples) and until Friday had not had access to the air monitoring plan. I was wondering if you might have some time to look over the plan and give us your opinion. The site is totally surrounded by homes and if it is not done right residents will once again be exposed. My concerns center on how few monitors they have; SCAQMD is focused on PM<sup>10</sup> and the model they are using seems to be a personal monitor not for open areas. Any feedback you can provide would be helpful. We do not want to compound the exposures already experienced by the residents. Thank you so much, Penny



**CCA EJ**

*Penny Newman*

**Center for Community Action and Environmental Justice**

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